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July 24, 2000

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re: Case Nos. TO-2000-374

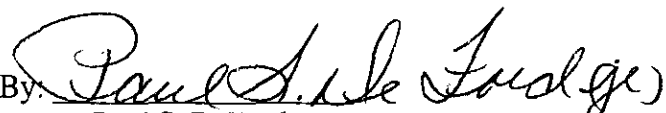
Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Statement of Position in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

By: 
Paul S. DeFord

Attachment

cc: All Parties of Record

FILED²
JUL 24 2000
Missouri Public
Service Commission

FILED³

JUL 24 2000

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Petition of the)
American Numbering Plan Administrator, on)
Behalf of the Missouri Telecommunications)
Industry, for Approval of NPA Relief Plan)
for the 314 and 816 Area Codes)
Case No. TO-2000-374

STATEMENT OF POSITION

COMES NOW AT&T Communications of the Southwest, Inc. and for its
Statement of Position states:

a. What, if any, action should the Commission take regarding number conservation
(i.e. number pooling, sequential numbering assignments, etc.) in the following NPAs?

1) 314 – AT&T believes that Number Pooling should be implemented consistent
with the FCC Interim Grant of Authority for Missouri, if required prior to the National
Number Pooling Roll-out Schedule (release of this schedule is projected for mid-2001).
Number Pooling in 314 is a reasonable conservation measure. Sequential Number
Assignment ("SNA") has been ordered by the FCC in CC Docket No. 99-200, and should
be implemented immediately throughout the state. Rate Center Consolidation ("RCC")
should be implemented wherever it can be done without significant rate and dialing
pattern changes. 314 RCC may already have been brought into conformance by
incumbents.

2) 816 – AT&T believes that Number Pooling should be implemented according to
the National Number Pooling Roll-out Schedule, which will be established in the near
future, as dictated by the FCC. Rate Center Consolidation ("RCC") should be

74

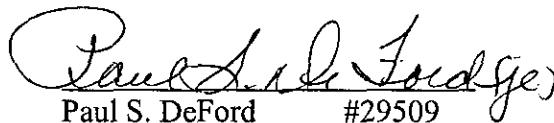
implemented wherever it can be done without significant rate and dialing pattern changes. SWBT has indicated an effort is underway to accommodate RCC in 816. Other carriers should also comply, as they are able.

b. What area code relief should the Commission order implemented in the following NPAs:

- 1) 314 – AT&T supports the industry recommended All Services Retroactive Overlay, which will allow for further benefits of Number Pooling to be achieved in the 636 NPA also.
- 2) 816 – AT&T supports the industry recommended All Services Overlay.

Respectfully submitted,

LATHROP & GAGE, L.C.



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Attorneys for AT&T Communications

CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TO-2000-374 was served upon the parties identified on the following service list on this 24th day of July, 2000 by either hand delivery or placing same in a postage paid envelope and depositing in the U.S. Mail.

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